REMARKS

Claims 1, 3 to 12, 14, and 16 are pending. The Examiner's reconsideration of the rejections is respectfully requested in view of the amendments and remarks.

Claims 10 and 16 have been rejected under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. The Examiner has requested that the acronyms that appear in the claim be defined. Claims 10 and 16 have been amended to define the acronyms. The Examiner's reconsideration of the rejection is respectfully requested.

Claims 1 and 6 have been rejected under 35 U.S.C. 103 (a) over U.S. Patent No. 6,487,566 to Sundaresan in view of U.S. Patent No. 5,617,528 to Stechmann et al., and further in view of Ross et al. (U.S. Patent No. 6,026,417). The Examiner stated essentially that the combined teachings of Sundaresan, Stechmann, and Ross teach or suggest all the limitations of claims 1 and 6.

Multiple cited prior art references must suggest the desirability of being combined, and the references must be viewed without the benefit of hindsight afforded by the disclosure. The Examiner has chosen a multitude of references, apparently in hindsight, to reject claims 1 and 6, however, each reference relates to an entirely different art, for example, Sundaresan teaches W3C XSL style for XML to XML transformations including content replacement, Stechmann relates to an interactive system for matching content to information fields, and Ross relates to changing a layout of content-filled desktop publishing documents in a windows OLE object environment. Given the different fields of the references, and the lack of a suggestion or motivation to combine the references, these references are not believed to be combinable. Therefore, reconsideration of

the rejections is respectfully requested.

Assuming, arguendo, that the references are combinable, the combined teachings of Sundaresan, Stechmann, and Ross fail to teach or suggest all the limitations of claims 1 and 6.

Claim 1 claims, *inter alia*, "a presentation style transformer for receiving a card display schema and for processing said card display schema to describe meta rules about presentation resources and content variable definitions for a card-based presentation specification; and a card-based presentation generator connected to said presentation style transformer for receiving said card-based presentation specification and a card-based document content and for providing formatting object descriptions." Claim 6 recites, *inter alia*, "presentation style transformer means for receiving a card layout style specification and a card display schema and for providing a card-based presentation specification; and card-based presentation generator means connected to said presentation style transformer means for receiving said card-based presentation specification and a card-based document content and for providing formatting object descriptions."

Sundaresan discloses a system for specifying transformation rules of XML language documents into other XML language documents. (See Col. 5, lines 1 to 7.) Sundaresan does not teach "a presentation style transformer for receiving a card display schema and for processing said card display schema to describe meta rules about presentation resources and content variable definitions" as claimed in claim 1 or "a presentation style transformer means for receiving a card display schema and for processing said card display schema to describe meta rules about presentation resources and content variable definitions" as claimed in claim 6. The transformation rules of Sundaresan take an XML document as input and produce an XML

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document as output. The transformation rules of Sundaresan are not adapted for "receiving a card display schema and for processing said card display schema to describe meta rules about presentation resources and content variable definitions" as claimed in claims 1 and 6. Therefore, Sundaresan fails to teach all the limitations of claims 1 and 6.

Stechmann discloses a method and apparatus for creating photo identification cards. The method and apparatus for creating photo identification cards uses a predetermined card design that specifies positions on the card for layout frames of a video picture and cardholder information which are to be printed on the card. An input device allows user commands to be entered and for cardholder information to be entered. (See Abstract.) Stechmann does not teach or suggest a presentation style transformer for "receiving a card display schema and for processing said card display schema to describe meta rules about presentation resources and content variable definitions", essentially as claimed in claims 1 and 6. Stechmann teaches how to process user commands for filling a template. Filling a template does not teach or suggest processing a card display schema to describe meta rules. Stechmann does teach or suggest a presentation style transformer for "receiving a card display schema and for processing said card display schema to describe meta rules about presentation resources and content variable definitions", essentially as claimed in claims 1 and 6. Therefore, Stechmann fails to cure the deficiencies of Sundaresan.

Ross teaches a contiguous data structure that can be used to store multiple pieces of information put down in an OPL by an author. (See Col. 7, lines 40 to 49.) OPLs are used by an author to change an existing document layout to a new document layout. (See Col. 9, lines 45 to 57.) Ross's data structure filed with author supplied changes specifying a new layout does not

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teach or suggest a presentation style transformer for "receiving a card display schema and for processing said card display schema to describe meta rules about presentation resources and content variable definitions", essentially as claimed in claims 1 and 6. Therefore, Ross fails to cure the deficiencies of combined teachings of Sundaresan and Stechmann.

The combined teachings of Sundaresan, Stechmann, and Ross fail to teach or suggest a presentation style transformer for "receiving a card display schema and for processing said card display schema to describe meta rules about presentation resources and content variable definitions", essentially as claimed in claims 1 and 6. The Examiner's reconsideration of the rejection is respectfully requested.

Claims 3, 5, 7, 10, 11, and 16 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Sundaresan, Stechmann, and Ross as applied to claims 1 and 6, and further in view of Ferrel et al. (U.S. Patent No. 5,907,837). The Examiner stated essentially that Sundaresan, Stechmann, Ross, and Ferrel teach or suggest all the limitations of claims 3, 5, 7, 10, 11, and 16.

Claims 3 and 5 depend from claim 1. Claims 10 and 11 depend from claim 6. Claim 16 depends from claim 12. The dependent claims are believed to be allowable for at least the reasons given for claims 1, 6, and 12. Claim 11 has been amended to define an acronym. The Examiner's reconsideration of the rejection is respectfully requested.

Claims 4, 8, and 9 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Sundaresan, Stechmann, Ross, Ferrel as applied to claims 1, 3, 5 to 7, 10, 11, and 16, and further in view of Shimizu et al. (U.S. Patent No. 6,374,271). The Examiner stated essentially that Sundaresan, Stechmann, Ross, Ferrel, and Shimizu teach or suggest all the limitations of claims

4, 8, and 9.

Claim 4 depends from claim 1. Claims 8 and 9 depend from claim 6. The dependent claims are believed to be allowable for at least the reasons given for claims 1 and 6. The Examiner's reconsideration of the rejection is respectfully requested.

Claim 12 has been rejected under 35 U.S.C. 103 (a) over Sundaresan in view of Stechmann. The Examiner stated essentially that the combined teachings of Sundaresan and Stechmann teach or suggest all the limitations of claim 12.

Claim 12 claims, *inter alia*, " generating presentation resource descriptions; translating declarative card layout style specifications into procedural card-based presentations; and generating a card based presentation."

Sundaresan discloses a system for specifying transformation rules of XML language documents into other XML language documents. (See Col. 5, lines 1 to 7.) Sundaresan does not teach "translating declarative card layout style specifications into procedural card-based presentations" as claimed in claim 12. Sundaresan's method of translating one XML document into another XML document does not teach or suggest translating a declarative specification into a procedural specification. Sundaresan does not teach or suggest "translating declarative card layout style specifications into procedural card-based presentations" as claimed in claim 12. Therefore, Sundaresan fails to teach all the limitations of claim 12.

Stechmann discloses a method and apparatus for creating photo identification cards. The method and apparatus for creating photo identification cards uses a predetermined card design that specifies positions on the card for layout frames of a video picture and cardholder information which are to be printed on the card. An input device allows user commands to be

entered and for cardholder information to be entered. (See Abstract.) Stechmann does not teach or suggest "translating declarative card layout style specifications into procedural card-based presentations" as claimed in claim 12. Stechmann's user commends for entering information do not teach or suggest a specification, much less "translating declarative card layout style specifications into procedural card-based presentations" as claimed in claim 12. Therefore, Stechmann fails cure the deficiencies of Sundaresan.

The combined teachings of Sundaresan and Stechmann fail to teach or suggest all the limitations of claim 12. The Examiner's reconsideration of the rejection is respectfully requested.

Claim 14 has been rejected under 35 U.S.C. 103 (a) over Sundaresan and Stechmann as applied to claim 14, and further in view of Shimizu. The Examiner stated essentially that the combined teachings of Sundaresan, Stechmann, and Shimizu teach or suggest all the limitations of claim 14.

Claim 14 depends from claim 12. Claim 14 is believed to be allowable for at least the reasons given for claim 12. The Examiner's reconsideration of the rejection is respectfully requested.

For the forgoing reasons, the present application, including claims 1, 3 to 12, 14, and 16, is believed to be in condition for allowance. The Examiner's early and favorable action is respectfully urged.

Respectfully submitted,

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